

FILED
CLERK'S OFFICE
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2004 JUL -6 P 4:29 DOCKET No. 04-10780-MEL

TOBY AMES,
Plaintiff,

v.

STAR REALTY TRUST, AUGUSTUS CIULLA
and ROSE CIULLA,
Defendants.

U.S. DISTRICT COURT
DISTRICT OF MASS.

JURY TRIAL DEMANDED

JOINT STATEMENT OF PROPOSED PRETRIAL SCHEDULE

NOW COME the parties in the above captioned matter and respectfully submit the following joint proposed pretrial schedule:

I. Joint Discovery Plan

<u>Proposed Deadline</u>	<u>Item</u>
8/6/04	Automatic Disclosures exchanged per Rule 26(a)
11/15/04	Service of written expert witness disclosures
12/15/04	Service of responsive written expert witness disclosures
2/15/05	All discovery completed The parties reserve the right to take de bene esse depositions of witnesses who will be unavailable for trial, at any time up to and including the last Friday preceding trial
4/1/05	Pre-Trial Conference
5/1/05	Trial

II. Proposed Schedule for Filing of Motions

Proposed Deadline

Item

3/1/05

Dispositive Motions Filed

III. Certifications

Certification pursuant to Local Rule 16.1 (D)(3)(a) and (b) will be filed separately.

Respectfully Submitted,

STAR REALTY TRUST ET AL
BY THEIR ATTORNEYS
COGAVIN AND WAYSTACK

7/6/04

Date

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Respectfully Submitted,

TOBY AMES
BY HIS ATTORNEYS
LATTI ASSOCIATES

7/6/04

Date

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